

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

INTERNATIONAL FRESH PRODUCE
ASSOCIATION, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
LABOR, *et al.*,

Defendants.

No. 1:24-cv-00309-HSO-BWR

MOTION TO WITHDRAW APPEARANCE

Pursuant to Local Rule 83.1(b)(3), the law firm of McDermott Will & Emery LLP (McDermott) and its attorneys, Paul W. Hughes and Connor J. Suozzo (collectively, Movants) respectfully request that this Court grant leave for Movants to withdraw their appearances as counsel of record for Plaintiffs the International Fresh Produce Association, American Farm Bureau Federation, Mississippi Farm Bureau Federation, Stone County Farm Bureau, Chamber of Commerce of the United States of America, AmericanHort, Florida Fruit & Vegetable Association, North American Blueberry Council, Texas International Produce Association, and U.S. Apple (collectively, the private Plaintiffs).

1. Movants previously entered *pro hac vice* appearances on behalf of the private Plaintiffs.
2. Pursuant to Local Rule 83.1(b)(3), “an attorney may be released only on motion signed by the client(s) or upon a duly noticed motion to all parties, including the client, and presented to the judicial officer to whom the case is assigned, together with a proposed order authorizing counsel’s withdrawal.”

3. Attorney Michael B. Kimberly has left the employment of McDermott Will & Emery LLP. Mr. Kimberly will continue to represent the private Plaintiffs in this matter through his new law firm, Winston & Strawn LLP along with Jonathan P. Dyal, M. Brant Pettis, and Alison G. Geter of Balch & Bingham LLP. All remaining counsel have previously entered appearances.

4. Therefore, Movants request leave to withdraw their appearances.

5. The private Plaintiffs consent to the requested withdrawal. This motion is unopposed by all parties.

WHEREFORE, Movants respectfully request that the Court approve withdrawal of their appearances as counsel of record and relieve them of any further obligations in this case.

Dated: June 26, 2025

Respectfully submitted,

/s/ M. Brant Pettis

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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing pleading or other paper with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

Dated: June 26, 2025

/s/ M. Brant Pettis